

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ANNA MARIA THOMAS, LEVERETT HOLMES, JOSEFINA CRUZ,  
BRIAN SALAZAR, DAVID PAKTER, PAUL SANTUCCI

On behalf of all persons similarly situated pedagogues  
Or tenured educational personnel unfairly brought up  
on 3020-a Disciplinary Charges since the 2002  
abolishment of the NYC Board of Education and  
subjected to unlawful confinement in Teacher  
Reassignment Centers a/k/a Rubber Rooms,

Plaintiffs,

-against-

ECF CASE: No.  
09-5167 (SLT)(RLM)

**PLAINTIFFS'**  
**AMENDED**  
**FIRST SET OF**  
**DOCUMENT**  
**DEMANDS**

NEW YORK CITY DEPARTMENT OF EDUCATION  
f/k/a BOARD OF EDUCATION OF THE CITY  
SCHOOL DISTRICT OF THE CITY OF NEW YORK;

JOEL I. KLEIN, in his official capacity as Chancellor of the  
CITY SCHOOL DISTRICT OF THE CITY  
OF NEW YORK and individually;

LAWRENCE BECKER, in his official capacity as  
Chief Executive Officer DIVISION OF HUMAN  
RESOURCES and individually;

PHILIP CROWE, in his official capacity as  
HUMAN RESOURCES DIRECTOR, and individually;

JUDITH RIVERA, in her official capacity as DEPUTY  
HUMAN RESOURCES DIRECTOR and individually;  
Defendants.

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1. For each Teacher for whom Observation Reports were a factor in the decision to remove a teacher from the school or were used in the charges against the teacher, or part of the charges or element of charges, provide observation reports for the last year before the removal of the teacher, and for two previous years as well. Also provide the last two years of observation reports for that teacher under a different/prior administrator.

2. Provide Observation Reports for teachers at the same school and at the same grade level for the years that Observation Reports were submitted for the teacher in question or for High

School or middle school teachers in the same school, for the all the teachers in the same department as the teacher who was removed.

3. For Teachers for whom Observation Report(s) played a part in their Specifications or 3020-a hearings provide all Observation reports written by the same supervisor, for all teachers, at the same school, for each supervisor making Observation report of the disciplined teacher, in the same year.

4. Provide all reports from Public Employees Safety and Health ("PESH"), the Department of Health, Department of Labor, the United Federation of Teachers, and Public Employees Relation Board ("PERB") and letters written to the Deputy Directors of Human Resources or other Administrators regarding conditions since 2002 in all TRC's and what was done about each complaint, when it was done and to which TRC did it pertain? .

5 Provide the number of teachers who went through a 3020-a, resigned prior to or during the 3020-a, made settlements other than resignations, made settlements without going through the 3020-a and were subsequently terminated providing the settlement agreement along with the specifications of the charges for each of the herein types of settlements.

6. Provide all complaints made by teachers to DOE EEO office in the past 10 years.

7. Provide all teacher complaints to EEOC, NYSDHR, NYCCHR, since 1998

8. Provide all inspection reports, all investigation results, all citations for violations, from any outside agency over the past 10 years, focusing on but not limited to all agencies mentioned on this page.

9. Provide all agreements, correspondence, meeting notes, minutes, memoranda, emails, exchanged between UFT officials, executives and executive committee members and the DOE for the past 10 years.

10. Provide all agreements, correspondence, meeting notes, minutes, memoranda, emails, exchanged between CSD Superintendents, other Superintendents, officials, executives and executive committee members and the DOE for the past 10 years on the subject of Teacher Hiring policies, Teacher Discipline, Teacher Tenure, initiatives to replace teachers with long service records with new hires and closely related subject matter.

11. Provide all syllabi, course outlines, handouts, lecture notes from the Leadership Academy for principal training dealing with pedagogical personnel focusing on but not limited to hiring, firing, disciplining, granting tenure, evaluating, EEO and diversity.

12. For each enrollee in the Leadership Academy, provide application to academy and service history during and after the academy.

13. For each Principal hired in the last 10 years, provide C-30 application form and letters inviting that individual to Level I and Level II and Level III (where used) C-30 competitive interview process.

14. Provide all directives, speeches, and communications of all types per schedule A of documents of any kind type or form from any of the named defendants in this case on the subjects of pedagogical hiring, firing, disciplining, granting tenure, evaluating, EEO and diversity.

15. Provide all directives, speeches, and communications of all types per schedule A of documents of and kind type or form from any of the named defendants in this case on the subjects of reassigned teacher hours, pay adjustments, withholding pay, instructions to payroll secretaries, rules for TRCs, promulgation of new rules for TRCs, Chancellor's regulation C-770, and any other materials and documents pertaining to operation, reassignment to, teacher rules, rights and prohibitions for the TRCs.

Dated: New York, New York  
June 11, 2010

JOY HOCHSTADT, P.C.  
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By: \_\_\_\_\_s/\_\_\_\_\_

Joy Hochstadt (JH0935)